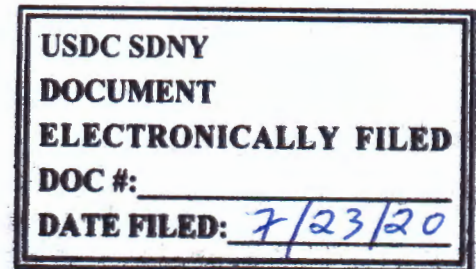


**LAW OFFICES OF
KOFFSKY & FELSEN, LLC**
1150 BEDFORD STREET
STAMFORD, CONNECTICUT 06905
(203) 327-1500
FACSIMILE (203) 327-7660

July 22, 2020



BY CM/ECF

The Honorable Kimba M. Wood
United States District Judge
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

MEMO ENDORSED

Re: *Jamal Brissett*
United States v. ~~Robert Wilson~~
1: 19 Cr. 153 (KMW)

Dear Judge Wood-

The undersigned, together with Attorneys Bobbi C. Sternheim and Alex S. Huot, respectfully move for a ninety (90) day continuance of the September 9, 2020 trial date previously set by the Court. Counsel so moves for the following reason:

The Covid19 Pandemic, in addition to causing a catastrophic health care crisis, has caused widespread disruption in lives and businesses and nowhere more disruptive than in the criminal courts. Court business has been severely curtailed, and the scheduling of matters has been thrown asunder. Counsel in the above case can only guess when the courts in which they practice will resume some semblance of normalcy, where counsel has adequate, private time to discuss matters with their clients and the ability to investigate the charges brought by the government.

As the Court knows, for more than four months, it has been virtually impossible for counsel to have meaningful meetings with the detained Mr. Brissett, to confidentially discuss both trial strategy and possible resolutions with him. We have no idea when such meetings will again take place. To require this very serious case to proceed to trial in the Fall, before the Courts and the prisons are able to resume some semblance of normal operations and under what conditions, would be a disservice to our client and of course, to the Court.

The undersigned has discussed this application to continue the trial date with Assistant United States Attorney Hagen Scotten and he agrees that an adjournment of the September 9, 2020 trial date would be in the interests of justice in order to avoid prejudice to the parties and to accommodate the ongoing public health crisis brought on by the COVID-19 pandemic. As such,

LAW OFFICES OF

KOFFSKY & FELSEN, LLC

counsel for the defendant respectfully requests that the trial date in this matter be adjourned for ninety (90) days to a date convenient to the Court and counsel.

} Granted
KMW

If the Court were to grant the defendant's application to continue the trial date, the defendant would have no objection to the exclusion of time under the Speedy Trial Act, pursuant to 18 U.S.C. § 3161(h)(1)(A) until the new trial date set by the Court.

} Granted
KMW

Trial is adjourned to
December 1, 2020, at 9:00 a.m.
Time is excluded through
December 1, 2020, pursuant to
18 U.S.C. 3161(h)(1)(A)

Respectfully submitted,
JAMAL BRISSETT
The Defendant

Bruce D. Koffsky
Bruce D. Koffsky, Esq.

BDK/me

cc: All Counsel of Record via ECF/Email

SO ORDERED: N.Y., N.Y. 7/23/20

Kimba M. Wood

KIMBA M. WOOD
U.S.D.J.